

In the United States District Court

for the Helena Division

United States of America

v.

Charles Bernard Parke
DefendantX
X
X
X
X
X
X
X
X
X
X
XAddendum for Compassionate
Release/Emergency Home-
Confinement

Case No. CR08-04-BU-CCL

Comes Now, defendant Parke with this Addendum to be filed from fear of facing Substantial Risk of COVID-19 exposure when defendant has NO ability to protect himself in a compromised BOP Institution from the Corona Virus Pandemic. As the Court knows this disease is taking one life after another "COVID-19," COVID-19 BOP, www.bop.gov/coronavirus (providing daily tallies of confirmed infections) FCI Terminal Island where defendant is being housed, has been hit particularly the hardest here in California (Lompoc, Terminal Island). Ten inmates have died. I.e., inmates live in closer proximity with NO ability to achieve social distancing. Wilson v. Pence, No. 2:20-cv-04451-MWF-PVC, Complaint 9-11 (C.D. Cal. May 16, 2020) ECF as Reflected by the declaration Attached to the Class Action by inmates at FCI Terminal Island the Institutions Medical capabilities are stretched thin and have proven to be unable to handle the dangerous problems according to COVID-19. I.e., at 4-5. Additionally inmates who test positive for COVID-19 are not re-tested, but are simply listed "Recovered" after 14 days. The death of Adrian Salazar-Londo is an example of at least one inmate dying from COVID-19 after FCI Terminal Island deemed him recovered from the Pandemic Virus.

The defendant is being housed in one of the BOPs COVID-19 hotspots, with the age over 50, Chronic Medical Care Debilitating conditions that provides for the basis of a Sentence Reduction. SEE: Million-dollar-meth dealer freed from Federal prison (Daily post staff Sep. 30, 2020), M Gmail cathy.jacobson4cturpin944@gmail.com, United States v. Gray, 416 F. Supp. 3d 784, 786 (S.D. Ind. Sep. 20, 2019), United States v. Yellin, No. 3:15-cr-3181-BTM-1, 2020 WL 3488738 at *3 (S.D. Cal. June 24, 2020), United States v. Gaitan, No. 18-cr-

4/6/2-BAS-1, 2020 WL 3469395 (S.D. Cal. June 25, 2020), At 2x (N.D. Cal. May 1, 2020) GRANTING ANOTHER inmate Compassionate Release housed at FCI Terminal Island, AN Institution "battling one of the most serious COVID-19 outbreaks in the BOPs system."

The defendant has served over 75% of Judgment Sentence Ordered by the Honorable Court, Not including Jail or Good time credits, with multiple Drug intervention classes, Re-entry program, Vocational schooling as he works on his Life skills to better himself as a person and a citizen in the New Community that he is going to in Bellevue, Nebraska with his Niece Mary Hol and Sister Liane Parke, As the defendant does not want to die in Prison especially when he could make Regular Medical appointments, see the Heart Specialists to get the care and medications he needs to stay alive in this serious time of this Pandemic. Defendant feels it does not matter if the remainder of the sentence imposed is converted into Supervised Release Supervision time if the Honorable Court feels suitable

Defendant also Requests Appointment of Counsel to help him as this is Filed Pro se and Request Representation.

MOVANT'S DECLARATION AND SIGNATURE

For the reasons stated in this motion, I move the Court for a Reduction in Sentence (Compassionate Release) under 18 U.S.C. § 3582(c)(1)(A). I declare under penalty of perjury that the facts stated in this motion are true and correct to the best of my knowledge Under Rule 1746 to my Signature below

3/4/2021
date

1:10pm
time

Respectfully
Charles B. Parke
Charles Bernard Parke